

# TIN FULTON WALKER & OWEN

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: United States v. Michael Smith, 24 Cr. 504 (JGK)*

Dear Judge Koeltl:

On behalf of our client, Michael Smith, we respectfully request a 60-day adjournment of the status conference scheduled for March 19, 2025, to allow the defendant additional time to review the discovery produced to date. The Government joins in this request.

The productions thus far are voluminous. Since the parties' last request for adjournment on January 6, 2025 [Dkt. 20], the Government has produced approximately 5.5 million files. The Government's previous productions comprised 2.84 terabytes and over 2 million files. The contents of these productions were mainly records obtained through search warrants or subpoenas, including emails, financial records, records from music streaming services, and records from online service providers. A 60-day adjournment will allow the defendant to continue reviewing the substantial discovery produced in this case.

If the Court grants this request, the defendant consents to the time between March 19, 2025, and the new conference date being excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interests of justice, to permit the defendant to continue to review the discovery produced in the case and to consider any motions.

Respectfully submitted,

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